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16		Tampa, FL 33602 Telephone: (813) 223-5505
17		Counsel for Plaintiffs
18	UNITED STATES	DISTRICT COURT
19	NORTHERN DISTRICT OF CALIFORNIA	
20	SAN FRANCISCO DIVISION	
21	ANIBAL RODRIGUEZ, et al. individually and o behalf of all others similarly situated,	n Case No. 3:20-CV-04688-RS
22	Plaintiff,	JOINT STIPULATION AND
23	·	[PROPOSED] ORDER EXTENDING DISCOVERY, CLASS CERTIFICATION
24	VS.	BRIEFING SCHEDULE, AND
25	GOOGLE LLC,	HEARING DATE
26	Defendant.	Judge: Hon. Richard Seeborg
27		Courtroom: 3, 17 th Floor
28	STIDLII ATION EVTENDING DISCOVEDY OF A	SS CERTIFICATION BRIFFING SCHEDLILE AND

STIPULATION EXTENDING DISCOVERY, CLASS CERTIFICATION BRIEFING SCHEDULE, AND HEARING DATE

Case No. 3:20-CV-04688-RS

1	Pursuant to C
2	and Defendant Googl
3	this joint stipulation.
4	WHEREAS,
5	Case Management So
6	witness disclosures, re
7	and
8	WHEREAS,
9	schedule and hearing
10	the Court entered on
11	WHEREAS,
12	discovery deadlines a
13	complete ordered and
14	WHEREAS,
15	for the Court-ordered
16	WHEREAS, 1
17	WHEREAS,
18	additional time to cor
19	WHEREAS, t
20	class certification brid
21	NOW THERI
22	parties to this action,
23	this case:

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. ("Plaintiffs")
and Defendant Google LLC ("Google"), collectively referred to as the "Parties," hereby enter into
this joint stipulation.

WHEREAS, on November 22, 2021, the Court granted plaintiffs' Motion for Relief from Case Management Schedule, extending the deadlines for the close of fact discovery, initial expert witness disclosures, rebuttal expert witness disclosures, and the close of expert discovery (Dkt. 180), and

WHEREAS, on February 1, 2022, the parties stipulated to a new class certification briefing schedule and hearing date consistent with the Court's November 22, 2021 order (Dkt. 214), which the Court entered on February 1, 2022 (Dkt. 215), and

WHEREAS, on May 20, 2022 (Dkt. 243), the parties stipulated to an extension of all discovery deadlines and the class certification briefing and hearing schedule to allow the parties to complete ordered and pursued discovery, and

WHEREAS, Google has represented that it substantially completed document production for the Court-ordered and agreed upon search terms on July 28, 2022;

WHEREAS, the close of fact discovery is currently scheduled for September 26, 2022, and WHEREAS, the parties have agreed to an extension of the fact discovery cutoff to allow additional time to complete discovery; and

WHEREAS, the parties have also agreed to extensions for other discovery deadlines and the class certification briefing and hearing schedule;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, that the following dates and deadlines for further proceedings should apply to this case:

•	Close of Fact Discovery:	October 31, 2022

•	Initial Expert Witness Disclosures:	January 20, 2023
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• Rebuttal Expert Witness Disclosures: May 1, 2023

• Close of Expert Discovery: June 2, 2023

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1	Motion for Class Certification:	June 9, 2023
2	Opposition to Motion for Class Certificati	on: July 14, 2023
3	Reply In Support of Class Certification:	August 11, 2023
4 5	Hearing on Class Certification:	At the Court's discretion, but proposed for August 24, 2023 at 1:30 PM
6	A Proposed Order is submitted concurrer	ntly herewith.
8 9	IT IS SO STIPULATED.	
10	DATED: August 11, 2022	WILLKIE FARR & GALLAGHER, LLP
11 12		By: /s/ Eduardo E. Santacana Eduardo E. Santacana
13		Attorneys for Defendant Google LLC
14		
15	DATED: August 11, 2022	SUSMAN GODFREY LLP
16		By: <u>/s/ Amanda Bonn</u> Amanda Bonn
17 18		Attorneys for Plaintiffs
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28	CENTRAL A TRANSPORTE TO THE STATE OF THE STA	2 SS CERTIFICATION BRIEFING SCHEDULE, AND
	STIPULATION EXTENDING DISCOVERY, CLA	SS CERTIFICATION BRIEFING SCHEDULE, AND

STIPULATION EXTENDING DISCOVERY, CLASS CERTIFICATION BRIEFING SCHEDU HEARING DATE

Case No. 3:20-CV-04688-RS

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

DATED: August 11, 2022 SUSMAN GODFREY L.L.P.

/s/ Amanda Bonn

Amanda Bonn

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19	UNITED STATES DISTRICT COURT	
20	NORTHERN DISTRICT OF CALIFORNIA	
21	SAN FRANCISCO DIVISION	
22	ANIBAL RODRIGUEZ, et al. individually and or behalf of all others similarly situated,	Case No. 3:20-CV-04688-RS
23	Plaintiff,	[PROPOSED] ORDER EXTENDING DISCOVERY, CLASS CERTIFICATION
24	VS.	BRIEFING SCHEDULE, AND HEARING DATE
25	GOOGLE LLC,	
26	Defendant.	Judge: Hon. Richard Seeborg Courtroom: 3, 17 th Floor
27		
28	[DDODOCED] ODDED EVTENDING DISCOVEDY	CLASS CERTIFICATION PRIETRIC SOURTH F

[PROPOSED] ORDER EXTENDING DISCOVERY, CLASS CERTIFICATION BRIEFING SCHEDULE, AND HEARING DATE
Case No. 3:20-CV-04688-RS

1	Pursuant to stipulation of the Parties, the Court hereby ORDERS that the deadlines in thi	
2	case are extended as follows:	
3	Close of Fact Discovery:	October 31, 2022
4	Initial Expert Witness Disclosures:	January 20, 2023
5	Rebuttal Expert Witness Disclosures:	May 1, 2023
6	Close of Expert Discovery:	June 2, 2023
7	Motion for Class Certification:	June 9, 2023
8	Opposition to Motion for Class Certification:	July 14, 2023
9	Reply In Support of Class Certification:	August 11, 2023
10 11	Hearing on Class Certification:	[At the Court's discretion, but proposed for August 24, 2023 at 1:30 PM]
12	IT IS SO ORDERED.	
13		
14		
15	Dated:	
16	Ho	norable Richard Seeborg
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[PROPOSED] ORDER EXTENDING DISCOVERY, CLASS CERTIFICATION BRIEFING SCHEDULE, AND HEARING DATE
Case No. 3:20-CV-04688-RS